



Myron T. Steele  
Of Counsel  
Direct 302.984.6030

August 13, 2025

**BY HAND DELIVERY & CM/ECF**

The Honorable Leonard P. Stark  
United States District Court for the District of Delaware  
J. Caleb Boggs Federal Building  
844 North King Street  
Wilmington, DE 19801-3570

Re: *Crystallex International Corp. v. Bolivarian Republic of Venezuela*,  
D. Del. C.A. No. 1:17-mc-00151-LPS

Dear Judge Stark,

Robert B. Pincus, in his capacity as special master for the United States District Court for the District of Delaware in the above-captioned case (the “**Special Master**”),<sup>1</sup> respectfully submits this letter regarding recent developments in the sale process. In light of the unauthorized disclosure of confidential information regarding a competing proposal contained in Red Tree’s August 12, 2025 letter (D.I. 2025), the Special Master respectfully requests that the Court adjourn the status conference currently scheduled for August 13, 2025, so that the Special Master can consider the recent developments. The Special Master will broadly meet and confer with the parties expected to participate in the hearing and provide an updated proposal to the Court on how to proceed with respect to the status conference and the sale hearing by Thursday, August 14, 2025, at 4:00 p.m.

Respectfully submitted,

/s/ Myron T. Steele

Myron T. Steele

On Behalf of Robert B. Pincus, Special Master for  
the United States District Court for the District of  
Delaware

cc: All Counsel of Record

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<sup>1</sup> All capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the *Sixth Revised Proposed Order (A) Establishing Sale and Bidding Procedures, (B) Approving Special Master’s Report and Recommendation Regarding Proposed Sale Procedures Order, (C) Affirming Retention of Evercore as Investment Banker by Special Master and (D) Regarding Related Matters* (D.I. 481) (the “**Sale Procedures Order**”).